

FILED

2013 MAY 16 AM 11:20

CS

*Signed
Propose order
2
Emr
WCRD*

Allen B. Felahy (State Bar No. 190177)
AFelahy@Felahylaw.com
 Oscar Ramirez (State Bar. No. 236768)
ORamirez@Felahylaw.com
FELAHY LAW GROUP
 4000 Cover Street, Suite 100
 Long Beach, California 90808
 Phone: (562) 499-2121
 Fax: (562) 499-2124

Attorneys for Plaintiff William Stewart

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

WILLIAM STEWART, an individual.
 Plaintiff,
 v.
 THE BOEING COMPANY, a
 Delaware Corporation and DOES 1
 through 50, inclusive.
 Defendants.

Case No. CV12-5621 RSWL (AGR_x)

**APPLICATION TO FILE THE
 SUPPLEMENTAL DECLARATION
 OF ALLEN B. FELAHY AND
 DECLARATION OF JENNIFER
 YANNI UNDER SEAL FOR THE
 COURT'S *IN CAMERA* REVIEW**

Date: June 18, 2013
 Time: 10:00
 Courtroom: 21
 Judge: Ronald S.W. Lew

BY FAX

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Central District of California Local Rule 79-5.1, Felahy Law Group ("FLG") hereby seeks an Order permitting FLG to file the following documents under seal with the Court:

1. Supplemental Declaration of Allen B. Felahy in Support of Motion of Felahy Law Group to Withdraw as Counsel for Plaintiff; and

2. Declaration of Jennifer Yanni in Support of Motion of Felahy Law Group to Withdraw as Counsel for Plaintiff.

FLG makes this Application based on Local Rule 79-5.1. This Application is also based on the grounds that the Supplemental Declaration of Allen B. Felahy in Support of Motion of Felahy Law Group to Withdraw as Counsel for Plaintiff; and Declaration of Jennifer Yanni in Support of Motion of Felahy Law Group to Withdraw as Counsel for Plaintiff (the "Confidential Declarations") contain information and exhibits that contain information that is protected from disclosure by the attorney-client privilege. See, e.g., Clarke v. American Commerce Nat. Bank, 974 F.2d 127, 129 (9th Cir. 1992) (no waiver of attorney-client privilege by submitting documents to the court for in camera review); In re Perrigo Co., 128 F.3d 430, 441 (6th Cir. 1997) (same). In addition, this Application is based on the ground that the Supplemental Declaration of Allen B. Felahy contains nonpublic personal information protected from disclosure by the United States Constitution, the California Constitution, Art. I, § 1, and California common law.

Dated: May 15, 2013

Respectfully submitted,

FELAHY LAW GROUP, APC

By: /s/ Allen B. Felahy
Allen B. Felahy

Attorneys for Plaintiff William Stewart